

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF KEVIN M. SHEA

I, Kevin M. Shea, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and I remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center (“WTC”) Towers occurred. At the time of these horrific attacks, I worked as a firefighter with Ladder 35 for the Fire Department of New York (FDNY).

4. I had not been scheduled to work on 9/11 as I had completed an overnight tour of duty with Ladder 35 on September 10, 2001. However, after the two passenger jets struck the North and South Towers, I went to the World Trade Center area as quickly as possible with several of my fellow firefighters.

5. Upon arrival at the World Trade Center, I entered the lobby of the South Tower to assist other firefighters with the rescue effort and to battle fires that had erupted in the building. I

heard another firefighter scream that the South Tower had begun to collapse, so I quickly dropped my firehose, and I ran out of the lobby of the building to escape the falling debris.

6. I saw people jumping out of windows of the building and falling to their deaths on the concrete, and I saw large chunks of debris falling to the ground. The scene looked like a war zone.

7. As the South Tower collapsed, the force of the blast blew me off my feet and to the ground. The falling debris struck me on my head and neck. I sustained serious injuries from the falling debris, including a broken neck and severe trauma to my body. After being struck by the falling debris, I somehow managed to crawl about two hundred feet before I collapsed and lost consciousness.

8. Rescue workers later found me near the corner of Albany Street and West Street. I was unconscious and covered by building debris. They revived me and transported me to a hospital in New Jersey by way of a police boat for the initial treatment of my severe injuries.

9. As a result of these terrorist attacks, I suffered the following specific injuries¹ on September 11, 2001: a cervical neck injury that required surgical intervention², a vertebral fracture that required surgical intervention³, damaged bones and tendons in both hands that required surgical intervention⁴, bilateral testicular loss that required surgical intervention⁵, an abdominal injury that required surgical intervention⁶, a bruised kidney⁷, and a torn rotator cuff of the left

¹ See, Medical Records of Kevin M. Shea (SHEA_MEDS_0001), attached hereto as Exhibit B, at 0001-0007.

² *Id.* at 0001-0007.

³ *Id.* at 0001-0007.

⁴ *Id.* at 0002-0003, and 0006-0007.

⁵ *Id.* at 0001-0002.

⁶ *Id.* at 0002.

⁷ *Id.* at 0001.

shoulder⁸. Lastly, my doctors diagnosed me with post-traumatic stress disorder⁹ due to the horrific events that I experienced on 9/11.

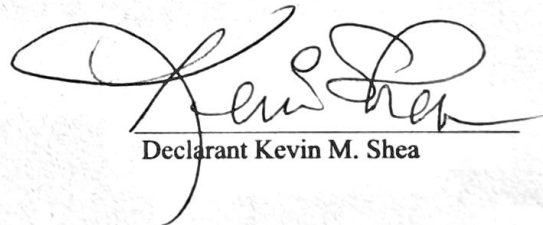
10. I sought and continue to seek medical attention for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001, terrorist attacks.

11. Attached as Exhibit C to this Declaration is a true and correct copy of a photo taken near Ground Zero shortly after the collapse of the South Tower in which I am unconscious and covered in ash and building debris. Further, attached as Exhibit D to this Declaration are true and correct copies of news articles and interviews published after the events of 9/11 in which I relayed my experiences on that horrific day.

12. I previously pursued a claim (VCF Number Unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 30 day of August 2022.



Declarant Kevin M. Shea

⁸ *Id.* at 0002-0004.

⁹ *Id.* at 0005.

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**